

# **Exhibit A**

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF QUEENS

Index No.: 701010/2022  
Date Purchased: 1/17/2022

= = = = = X  
BOZENA MROZIEWSKA,

**SUMMONS**

Plaintiff,

-against-

Plaintiff designates  
QUEENS  
County as place of trial

REGO II BORROWER, LLC and  
TJX COMPANIES/TJ MAXX,

The basis of the venue  
is:  
Place of Accident

Defendants.


= = = = = X  
To the above-named defendant(s):

**YOU ARE HEREBY SUMMONED** to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the Plaintiff's Attorneys within 20 days after the service of this summons exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded herein.

Dated: New York, New York  
January 17, 2022

**THE HAMEL LAW FIRM, P.C.**

BY:

  
\_\_\_\_\_  
William Hamel, Esq.

Attorneys for Plaintiff  
Address and Telephone Number  
11 East 44<sup>th</sup> Street, 19th Floor  
New York City, N.Y. 10017  
(212) 858-0600

Defendant's Address

**REGO II BORROWER, LLC**  
28 Liberty Street  
New York, N.Y. 10005

**TJX COMPANIES/TJ MAXX**  
6101 Junction Blvd.  
Rego Park, N.Y. 11374

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF QUEENS

=====X  
BOZENA MROZIEWSKA

Index No.: 701010/2022  
Date Purchased: 1/17/2022

Plaintiff,

VERIFIED COMPLAINT

-against-

REGO II BORROWER, LLC and  
TJX COMPANIES/TJ MAXX,

Defendants.  
=====X

BOZENA MROZIEWSKA, by her attorneys, THE HAMEL LAW FIRM, P.C., complaining of the defendants herein, respectfully shows to this court and alleges as follows:

1. That at all the times hereinafter alleged, and upon information and belief, the defendant, **REGO II BORROWER, LLC**, was and still is a domestic corporation organized and existing under and by virtue of the laws of the State of New York.

2. That at all the times hereinafter alleged, and upon information and belief, the defendant, **REGO II BORROWER, LLC**, was and still is a foreign corporation authorized to do business under and by virtue of the laws of the State of New York.

3. That at all the times hereinafter alleged, and upon information and belief, the defendant, **TJX COMPANIES/TJ MAXX**, was and still is a domestic corporation organized and existing under and by virtue of the laws of the State of New York.

4. That at all the times hereinafter alleged, and upon information and belief, the defendant, **TJX COMPANIES/TJ MAXX**, was and still is a foreign corporation authorized to do business under and by virtue of the laws of the State of New York.

5. That at all the times hereinafter alleged, and upon information and belief, the defendant, **REGO II BORROWER, LLC**, owned the premises known as 6101 Junction Blvd., in the County of Queens, City and State of New York.

6. That at all the times hereinafter alleged, and upon information and belief, the defendant, **REGO II BORROWER, LLC**, operated the premises located at 6101 Junction Blvd., in the County of Queens, City and State of New York.

7. That at all the times hereinafter alleged, and upon information and belief, the defendant, **REGO II BORROWER, LLC**, maintained the premises located at 6101 Junction Blvd., in the County of Queens, City and State of New York.

8. That at all the times hereinafter alleged, and upon information and belief, the defendant, **REGO II BORROWER, LLC**, managed the premises located at 6101 Junction Blvd., in the County of Queens, City and State of New York.

9. That at all the times hereinafter alleged, and upon information and belief, the defendant, **REGO II BORROWER, LLC**,

controlled the premises located at 6101 Junction Blvd., in the County of Queens, City and State of New York.

10. That at all the times hereinafter alleged, and upon information and belief, the defendant, **TJX COMPANIES/TJ MAXX**, leased the premises known as 6101 Junction Blvd., in the County of Queens, City and State of New York.

11. That at all the times hereinafter alleged, and upon information and belief, the defendant, **TJX COMPANIES/TJ MAXX**, operated the premises located at 6101 Junction Blvd., in the County of Queens, City and State of New York.

12. That at all the times hereinafter alleged, and upon information and belief, the defendant, **TJX COMPANIES/TJ MAXX**, maintained the premises located at 6101 Junction Blvd., in the County of Queens, City and State of New York.

13. That at all the times hereinafter alleged, and upon information and belief, the defendant, **TJX COMPANIES/TJ MAXX**, managed the premises located at 6101 Junction Blvd., in the County of Queens, City and State of New York.

14. That at all the times hereinafter alleged, and upon information and belief, the defendant, **TJX COMPANIES/TJ MAXX**, controlled the premises located at 6101 Junction Blvd., in the County of Queens, City and State of New York.

15. That on or about December 5, 2021, the plaintiff **BOZENA MROZIEWSKA**, was on the aforesaid premises.

16. That on or about December 5, 2021, the plaintiff **BOZENA MROZIEWSKA**, was on the aforesaid premises and she was caused to fall.

17. That the aforesaid accident was due solely and wholly as a result of the careless, reckless and negligent manner in which the defendants owned, operated, maintained, managed and controlled the aforesaid premises, without the plaintiff in any way contributing thereto.

18. That the defendants herein were negligent, reckless and careless in that they violated their duties to persons on the aforesaid premises and to this plaintiff in particular, in knowingly permitting, suffering and allowing the aforesaid premises to be, become and remain in a defective, unsafe and dangerous condition, and was further negligent in failing to take suitable precautions for the safety of persons lawfully on the aforesaid premises.

19. That by reason of the foregoing and the negligence of the defendant, the plaintiff, **BOZENA MROZIEWSKA**, was severely injured, bruised and wounded, suffered, still suffers and will continue to suffer for some time physical pain and bodily injuries

and became sick, sore, lame and disabled and so remained for a considerable length of time.

20. That by reason of the foregoing, the plaintiff, **BOZENA MROZIEWSKA**, was compelled to and did necessarily require medical aid and attention, and did necessarily pay and become liable therefor for medicines and upon information and belief, the plaintiff, **BOZENA MROZIEWSKA**, will necessarily incur similar expenses.

21. That by reason of the foregoing, the plaintiff, **BOZENA MROZIEWSKA**, has been unable to attend to her usual occupation in the manner required.

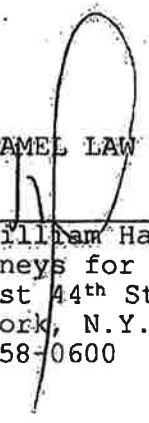
22. That one or more of the exceptions of §1602 of the Civil Practice Law and Rules do apply to the within action.

23. That as a result of the foregoing, the plaintiff, **BOZENA MROZIEWSKA**, sustained damages in an amount that exceeds the jurisdictional limits of the lower Courts.

WHEREFORE, plaintiff demands judgment against the defendant in an amount that exceeds the jurisdictional limits of the lower Courts, all together with the costs and disbursements of this action.

Dated: New York, New York  
January 17, 2022

THE HAMEL LAW FIRM, P.C.

By:   
Attorneys for Plaintiff  
11 East 44<sup>th</sup> Street, 19th Floor  
New York, N.Y. 10016  
212 858-0600



STATE OF NEW YORK, COUNTY OF NEW YORK

I, WILLIAM R. HAMEL, the undersigned, an attorney admitted to practice in the courts of New York State, state under penalty of perjury that I am one of the attorneys for the plaintiff in the within action; I have read the foregoing SUMMONS and COMPLAINT and know the contents thereof; the same is true to my own knowledge, except as to the matters therein stated to be alleged on information and belief, and as to those matters I believe to be true. The reason this verification is made by me and not by my client, is that my client is not presently in the County where I maintain my offices. The grounds of my belief as to all matters not stated upon my own knowledge are the materials in my file and the investigations conducted by my office.

**Dated:**        **New York, New York**  
January 17, 2022



WILLIAM R. HAMEL

Index No.: 701010/2022

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF QUEENS

=====

BOZENA MROZIEWSKA,

Plaintiff,

-against-

REGO II BORROWER, LLC and  
TJX COMPANIES/TJ MAXX,

Defendants.

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SUMMONS AND VERIFIED COMPLAINT

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THE HAMEL LAW FIRM P.C.

Attorneys for Plaintiff

Office and Post Office Address, Telephone

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